

NorthMet Mining Project and Land Exchange EIS

EPA Items Batch 3 – Presentation Meeting Agenda

Tuesday, February 24, 2015 – 2:00 PM to 4:00 PM CT
DNR Central Office, 2nd Floor Conference Room

1. Welcome/Agenda check
2. Process Check-in
3. EPA Remaining Issues Table

3a. Wetland Related Items

Preparatory Deliverables

- Wetland Management Plan v7 (see Sections 4.2 and 4.3) [Issue 14]
- Response to EPA Issue 13: wetland impacts due to new east side TB containment system [Issue 13]
- Response to EPA Comment #17: Wetlands - indirect impacts and mitigation [Issue 14]
- Response to EPA Comment #19: criteria for wetland fragmentation loss [Issue 21] (*pending*)
- Response to EPA Comment #20: 20% threshold for fragmentation [Issue 22] (*pending*)
- Response to EPA Comment #21: Update on wetland mitigation credits [Issue 15]
- USACE 2015a Letter from USACE to Jennifer Saran, PolyMet Mining [Issue 15]
- Response to EPA Comment #22: on-site wetland reclamation not used for mitigation credits [Issue 23]
- PFEIS Section 5.2.3.3 Wetland Mitigation and Monitoring [Issues 14, 15, 23]
- PFEIS Section 5.2.3.2.3: Plant Site Direct Effects [Issue 13]
- Response to EPA Comment #23: Inconsistency between Table 6.2-8 and Table 6.2-11 [Issue 24]
- Table 6.2-8 and PFEIS Section 6.2.3.4.1 Wetlands Approach [Issue 24]
- Table 6.2-11 and a portion of PFEIS Section 6.2.3.4.4 Cumulative Effects Assessment [Issue 24]

➤ Issue #13

The newly proposed (post-SDEIS) east tailings basin containment system will directly impact a small amount of wetlands.

- Action: Co-lead agencies will discuss how these wetland impacts will be considered for the PFEIS.

➤ Issue #14

The monitoring and mitigation plan for indirect wetland impacts has not been finalized.

- Action: Co-leads will summarize available information on the monitoring and mitigation plan for indirect wetland impacts in draft EIS sections and provide to EPA for review and comment. In addition, EPA will continue to work with USACE to make sure monitoring and mitigation for indirect impacts meets permitting requirements.

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➤ Issue #15

The proposed wetland mitigation sites may not provide sufficient credits for the proposed direct and indirect wetland impacts.

- Action: PolyMet is currently looking into prospective wetland mitigation options. Once this review is complete, EPA and USACE will determine if the proposed sites and acreage are sufficient to cover direct and indirect wetland impacts.

➤ Issue #21

Comment #19 criteria for wetland fragmentation loss

➤ Issue #22

Comment #20 20% threshold for fragmentation

➤ Issue #23

Comment #22 on-site wetland reclamation not used for mitigation credits

➤ Issue #24

Comment #23 Inconsistency between Table 6.2-8 and Table 6.2-11

3b. Water Related Items

Preparatory Deliverables

- Response to EPA Comment #13: pH extrapolation [Issue 20]
- Response to EPA Comment #7 : NPDES Permitting [Issue 2]
- Response to EPA Comment #8: Colby Lake Modeling [Issue 11]
- Colby Lake Modeling Inputs (workplan) [Issue 11]

Note: the following documents – previously shared with the EPA – are cited as additional information for the Response to EPA Comment #8 / Issue 11 (these documents are not included in the deliverables for Batch 3):

- NorthMet Project Mine Site Water Data Package v13; Section 5.2.4.8 Additional Loading to Colby Lake; page 148. [Issue 11]
- NorthMet Project Mine Site Water Data Package v13; Attachment C; Table 1-13 Existing Surface Water Concentrations; pdf-page 743. [Issue 11]

➤ Issue #2

During active mining and post-closure, water quality standard exceedances will be prevented through on-site treatment or other measures, before discharge to waters of the U.S. --SDS approach to monitoring

➤ Issue #11

Additional model inputs will be used to calculate water quality in Colby Lake.

- Action: Provide a list of additional input variables to EPA for review.

➤ Issue #20

Comment #13 – pH extrapolation

4. Other

5. Next Meeting: Batch 3 Resolution – Thursday, March 05, 2015, 1:00 PM to 4:00 PM CT